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MEMO ENDORSED

Rachel Perillo

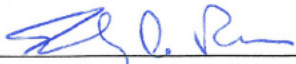
July 1, 2025

By ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Cesari, et al,
Including MIGUEL CINTRON
24 Cr. 154 (ER)

The application is X granted
_____ denied


Edgardo Ramos, U.S.D.J.
Dated: 7/2/2025
New York, New York

Dear Judge Ramos:

I am the attorney for Miguel Cintron, a defendant in the above-named matter. Mr. Cintron is on pretrial release with conditions that include travel restricted to the Southern and Eastern Districts of New York, as well as New Jersey and Connecticut for employment purposes. This letter is respectfully submitted without objection from Pretrial Services Officer Lanique Rhyne to request a temporary bond modification that would permit Mr. Cintron to travel to Allentown, Pennsylvania from July 3 – 7, 2025.

The purpose of this trip is (1) for Mr. Cintron to continue helping his father who is recovering from surgery (the Court previously granted Mr. Cintron's request to travel to Allentown, PA to assist his father, ECF Dkt. 188); and (2) Mr. Cintron and his wife recently purchased a home in Allentown, PA, his wife has already moved in, and his assistance is needed to help get the house in order. Pretrial Services Officer Rhyne is aware of the circumstances and has no objection to Mr. Cintron traveling for these purposes, so long as he provides her with his itinerary, which he agrees to do. Pretrial has also been provided with the address where Mr. Cintron intends to stay. The government, by AUSA Joseph Rosenberg, defers to Pretrial Services and therefore has no objection.

If the Court has any questions regarding this application, please do not hesitate to contact me.

Respectfully submitted,

/s/

Jeremy Schneider

cc: AUSA Joseph R. Rosenberg & AUSA Adam Margulies (by ECF)
USPTO Lanique Rhyne (by Email)